

# EXHIBIT 2

**Subject:** RE: Iacovacci v. Brevet Holdings, LLC, NYS Index No.: 158735/2016

**Date:** Monday, September 13, 2021 at 9:03:57 AM Eastern Daylight Time

**From:** Rea, Traci S.

**To:** Mary Kate George, Solomon, Louis M., Yang, Monica, Underwood, Colin A., Christine Laurent, Joseph Kim, Philip Semprevivo

**CC:** Ian Dumain, Paul Fattaruso, Evelyn Fruchter, Jason Cyrulnik, Adina Levine, David Ehrlich, Scott A. Weiss

Mary Kate:

We are in the process of gathering this information.

On the first point, we would like to discuss your proposal of last week that Brevet provide for inspection by Plaintiff's independent expert a representative Brevet office work-station computer and travel-use laptop at Reed Smith's offices. Please confirm that any such inspection would fully satisfy Plaintiff's discovery requests in both the state and federal action on the computer marking issue. If that is the case, please let us know a convenient time to discuss the parameters of any such inspection.

On the second issue, we have confirmed that Brevet uses and relies on the portfolio summaries that it provided in May in the course of its business.

We will be providing additional information on the remaining issues as soon as soon as possible.

In the interim, please let us know your earliest availability for a meet and confer call this week on Plaintiff's August 16 document production.

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**From:** Mary Kate George <mgeorge@cf-llp.com>

**Sent:** Friday, September 3, 2021 7:01 PM

**To:** Solomon, Louis M. <LSolomon@reedsmith.com>; Yang, Monica <myang@reedsmith.com>; Underwood, Colin A. <CUnderwood@reedsmith.com>; Rea, Traci S. <TRea@ReedSmith.com>; Christine Laurent <christine.laurent@lawbhs.com>; Joseph Kim <joseph.kim@lawbhs.com>; Philip Semprevivo <philip.semprevivo@lawbhs.com>

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**EXTERNAL E-MAIL - From [mgeorge@cf-llp.com](mailto:mgeorge@cf-llp.com)**

Counsel,

We have not received the supplemental information that Brevet was directed to provide at the July 15 status conference. Specifically:

1. Brevet was directed to supplement its Lan affidavit and to produce its photo exhibits with metadata.
2. Brevet was directed to confirm that the portfolio summaries it provided in May 2021 are actually used and relied upon by Brevet in the course of its business, notwithstanding the “unaudited” designation, and also to provide more information related to those summaries.
3. For the transactions “similar” to the Harvest Recovery Partners transaction, Brevet was directed to supplement its responses with items (i) through (viii) in our May 25 email: (i) transaction amount (specifying (a) the facility amount and (b) the closing proceeds amount), (ii) closing date, (iii) description of counterparty, (iv) rate of return, (v) fees, (vi) profit to Brevet, (vii) coupon, and (viii) maturity.

Please provide these disclosures as soon as possible, or otherwise let us know when you intend to provide them.

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